

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:
Lisa Francis	:
	Chapter 13
	Case No. 20-12746-ELF
Debtor(s)	:

**RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY LAKEVIEW LOAN SERVICING, LLC**

Debtor, Lisa Francis, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Lakeview Loan Servicing, LLC and hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor avers all payments were made to date.
7. Debtor opposes the same.
8. Denied. Debtor avers all payments were made to date.
9. Denied.
10. No response required.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: July 14, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Rebecca A. Soalrz, Esq.
Attorney for Movant *Lakeview Loan Servicing, LLC*
Electronic Notice to bkgroup@kmllawgroup.com

Dated: July 14, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107